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Ref: Comments regarding NAIS Draft Strategic Plan and Program Standards

Dear Sir,

We are grateful for the opportunity to submit a comment on the NAIS and applaud the efforts of Government, Agency and the wider industry in the constructive evolution being made on this critical issue.

Allflex has a single 50 year old mission, to assist in the implementation of animal identification systems. Today Allflex is the sole or a preferred supplier of official identification devices to over 30 National or state led livestock Identification systems across the world, delivering official ID devices directly to over 2 million farms.

We would like to first make a comment on the issue of Technology Neutrality. In our considered opinion the NAIS will at best not deliver on its goals, and at worst fail to operate if a standard Identification technology is not selected and utilized uniformly across the system. This is a critical operational issue for all sectors of the livestock industry that must report events to the NAIS database.

The US livestock industry is extremely large (geographically; numbers of livestock; number of premises) and complex in operation in terms of the variety and number of ways that animals move from one premises to another. The industry will not be able to commercially function if it has to be capable of dealing with all types of current and future identification devices and methods, let alone afford or attempt to manage the infrastructure required to deal with this massive variable.

Adopting a single ID technology will remove a crucial variable, provide simplification and focus, greatly improving the opportunity for a successful implementation and function of the NAIS.

We support the NAIS Draft Standards in its selection of low frequency ISO RFID as the chosen technology for identification of cattle. We note that this standard is also selected by both the Cattle Working Group Standards Subcommittee of the USAIP and the NCBA Animal ID Subcommittee.

This technology, of which there are multiple manufacturers, is proven across ten's of millions of cattle not only in the USA (e.g. Michigan TB eradication) where it has been in widespread use for over ten years, but as the chosen technology in Canada, Australia and other countries. Low frequency ISO RFID technology is the only Technology proven in real world agricultural situations to economically facilitate the rapid, accurate and secure collection of an animals ID number.

We further support the Draft Standards for performance of ISO RFID technology as an important method of ensuring functionality of the NAIS operation and of providing a safety net for the buyer in terms of that functionality.

Yours sincerely,
Brian W Bolton
President & CEO